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Hearing Date: TBD
Opposition Date: April 15, 2022
Reply Date: May 16, 2022

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,)	
Plaintiff-Applicant,)	Adv. Pro. No. 08-01789 (CGM)
v.)	
BERNARD L. MADOFF INVESTMENT SECURITIES, LLC,)	SIPA Liquidation
Defendant.)	(Substantively Consolidated)
In re:)	
BERNARD L. MADOFF,)	
Debtor.)	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,)	
Plaintiff,)	Adv. Pro. No. 12-01207 (CGM)
v.)	
LLOYDS TSB BANK PLC,)	ORAL ARGUMENT
Defendant.)	REQUESTED

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon Defendant Lloyds TSB PLC's (now known as Lloyds Bank plc) Memorandum of Law in Support of Its Motion to Dismiss, the accompanying Declarations of Anthony Paccione, dated February 15, 2022, and the exhibits thereto, the Complaint, dated March 22, 2012 (the "Complaint"), in the above-captioned adversary proceeding, and all prior pleadings and proceedings herein, Defendant Lloyds Bank plc ("Lloyds") moves for

an order dismissing the Complaint filed by plaintiff Irving H. Picard, Trustee (the “Trustee”) for the Liquidation of Bernard L. Madoff Investment Securities LLC, pursuant to Federal Rules of Civil Procedure 12(b)(6), as made applicable by Rule 7012 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation and Order in this proceeding entered December 28, 2021, the Trustee shall respond to this motion by April 15, 2022. If the Trustee responds to the motion, Lloyds shall file its reply by May 16, 2022.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Lloyds does not consent to the entry of final orders or judgment by this Court.

Dated: February 15, 2022
New York, New York

/s/ Anthony Paccione

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